

EXHIBIT 460

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

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IN RE: NATIONAL	:	
PRESCRIPTION	:	MDL No. 2804
OPIATE LITIGATION	:	
	:	Case No.
	:	1:17-MD-2804
THIS DOCUMENT RELATES	:	
TO ALL CASES	:	Hon. Dan A. Polster

- - -

Thursday, January 3, 2019

HIGHLY CONFIDENTIAL - SUBJECT TO FURTHER
CONFIDENTIALITY REVIEW

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Videotaped deposition of JILL A. STRANG, held
at the offices of Cavitch, Familo & Durkin,
1300 East Ninth Street, Cleveland, Ohio, commencing at
8:57 a.m., on the above date, before Carol A. Kirk,
Registered Merit Reporter and Notary Public.

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1 once a year -- that I'm going to trust their
2 judgment, yes.
3 Q. Okay. So you don't second-guess
4 what pharmacies are ordering, you just verify
5 that what they ordered is what they need?
6 A. I do verify.
7 Q. Is that a "yes"?
8 A. Yes.
9 Q. Okay. I'm going to hand you
10 Exhibit -- well, actually, hold on. Let me ask
11 a couple questions.
12 Did you ever exchange documents
13 with the pharmacists at stores regarding, let's
14 say, an order that was higher than normal?
15 A. No.
16 Q. Okay.
17 A. I'm sorry. What kind of document?
18 Q. Well, any document. Did you --
19 A. They would send me their six-week
20 average, over average, and would -- there's
21 mark -- you know, they would mark it down.
22 That's the only thing that I've ever had on
23 paper that they would send to me. And it says
24 my name at the top of that report.

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1 Q. Okay. I'm going to hand you
2 Exhibit 17, which is DDM440505.
3 ---
4 (DDM-Strang Exhibit 17 marked.)
5 ---
6 Q. This looks like a form. At the
7 top it says "Confidential. Attention chief
8 pharmacist."
9 Do you see that?
10 A. Yes.
11 Q. And then it's got a store number
12 and a date. Have you ever seen this document
13 before?
14 A. This particular one, no. The
15 actual piece of paper that before it's filled
16 out, I do know that Tom Nameth was responsible
17 for this before he retired.
18 Q. So you didn't create this?
19 A. I did not.
20 Q. And you didn't train people on how
21 to fill it out?
22 A. No.
23 Q. Do you know who did?
24 A. The director of operations,

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1 pharmacy operations, is who I would say.
2 Q. So probably Tom Nameth, but you
3 don't know for sure?
4 A. No.
5 Q. Did you ever work with these
6 documents?
7 A. No.
8 Q. Okay. So let's look at this.
9 This is dated May of 2008 and it's for store 5.
10 Do you see that?
11 A. Yes.
12 Q. And it says, "The Drug Enforcement
13 Agency" -- which is the DEA -- "has requested
14 that Discount Drug Mart pharmacy operations
15 maintain records of controlled substances
16 purchases that exceed an average of purchases
17 calculated from the previous 12 months or that
18 deviate substantially from normal average per
19 month."
20 Do you see that?
21 A. Yes.
22 Q. And the next line says, "The
23 April 2008 report indicates an increase in
24 purchases of hydro" -- do you know what that's

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1 referring to?
2 A. I'm sorry. I lost where you're
3 at.
4 Q. If you look at the highlighted --
5 MR. JOHNSON: It's right on the
6 screen.
7 A. Yes. Okay.
8 Q. Is that hydrocodone?
9 A. Yes.
10 Q. Okay. And it has, it looks like,
11 an NDC number after that?
12 A. Yes.
13 Q. And it says, "Your average monthly
14 purchases of this item are three bottles. This
15 month eleven bottles were ordered."
16 Do you see that?
17 A. Yes.
18 Q. Okay. Is that the type of
19 information that would be spit out on the
20 six-week average report?
21 A. I don't know.
22 Q. So do you have any idea what
23 context this document was used in?
24 MR. JOHNSON: You have to answer